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District of Columbia Zoning Commission
Office of Zoning
441 4th Street NW #200
Washington, DC 20001

October 6, 2022

RE: Case # 22-RT1 Racial Equity Analysis Tool

Dear Chairman Hood & Commissioners,

We urge the Zoning Commission (ZC) to ensure that the Racial Equity Analysis Tool (Case# 22-RT1) meets Comprehensive Plan requirements, is substantive and leads to meaningful change and equitable development outcomes.

Accordingly, we recommend that the Racial Equity Analysis Tool:

- a) Require Ongoing Meaningful Community Engagement,*
- b) Require Racial Equity Analysis for All Zoning Decisions,*
- c) Meaningfully Assess Displacement Risk,*
- d) Use Current & Historic Data, Track and Report Outcomes,*
- e) Consider Impact for Priority Groups and Vulnerable Populations,*
- f) Require Applicants to Take Actions that Advance Equity,*
- g) Make the Zoning Process Accessible,*
- h) Conduct Racial Equity Analysis within Community Planning*

Require Ongoing Meaningful Community Engagement

Zoning actions that limit the ability of impacted people to continue to be involved in decision making are inequitable. Meaningful involvement of impacted people is a central tenet of equity. Qualitative data must also be considered alongside quantitative. Zoning must require community engagement early in the development process, and ongoing throughout it.

Require Racial Equity Analysis for All Zoning Decisions

Racial Equity analysis must be conducted for all zoning decisions, including uncontested cases, map and text amendments. Standards for this type of analysis must be codified through a zoning text amendment. Accountability measures must be put in place for cases where racial equity analysis is not conducted.

Meaningfully Assess Displacement Risk:

Assessment of displacement risk is a critical component of racial equity impact analysis.

- a tool to assess displacement risk must be developed
- more specific questions to guide the assessment of displacement risk must be adopted
- evaluating potential "direct displacement" (on site) is not sufficiently comprehensive, the impact in the area surrounding the project must also be considered. For example, other jurisdictions consider the areas that are within ¼ mile of the project site in evaluating displacement risk.

Use Current & Historic Data, Track and Report Outcomes

The District has yet to develop the data tools and dashboards required by the Comprehensive Plan. The transparent use of data, disaggregated by race, is required to identify past and present inequities. Outcomes must be tracked and measured to determine progress in advancing racial equity. Housing affordability data must be contextualized to account for the median income for Black families in the target area.

Consider Impact for Priority Groups and Vulnerable Populations

The District's racial equity analysis must incorporate consideration of our special populations including native Washingtonians and people with disabilities.

Require Applicants to Take Actions that Advance Equity

When a project is taking place in a displacement risk area, the applicant should be required to take additional steps to address displacement and advance racial equity prior to coming to the ZC for approval.

Make the Zoning Process Accessible

The entire zoning process must be made accessible to impacted residents. Notice and standing rules must be amended, and digital exclusion and language access issues addressed.

Conduct Racial Equity Analysis within Community Planning

The Office of Planning advises the Zoning Commission and conducts the analysis to determine consistency with the Comprehensive Plan. The racial equity analysis requirement should be conducted within the community planning section of OP - not the zoning/development review section. The community planning section is better able to engage impacted communities, analyze data and determine racial equity impact. The Zoning section is not familiar with the impacted communities and cannot interpret the data and racial equity impact.

Again we ask that the Zoning Commission adopt these tenets in order to have a Racial Equity Analysis Tool (Case# 22-RT1) that meets Comprehensive Plan requirements and actively affirms racially equitable outcomes.

Signed:

ANC REPRESENTATIVES:

Paul Johnson Commissioner, 4C-07

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